



**MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION**

**OPERATIONAL MEMORANDUM  
NO. 13**

**SUBJECT: CRITERIA POLLUTANT THRESHOLD LEVELS FOR THE EMISSIONS  
INVENTORY**

**EFFECTIVE DATE:** November 25, 1996

**REVISED DATE:** February 14, 1997

**PREAMBLE**

Michigan Air Pollution Control Rule R336.202 (Rule 2) requires an annual report from a commercial, industrial, or governmental source of emission of an air contaminant if, in the judgment of the department, information on the quantity and composition of an air contaminant emitted from the source is considered by the department as necessary for the proper management of the air resources. In addition, Air Pollution Control Rules R 336.1208a, R 336.1210, and R 336.2208 contain emission reporting requirements.

In the past, nearly every permitted source was assigned a State Registration Number (SRN) and added to the emissions inventory system (EIS). In addition, many sources without permits (grandfathered) have been included. The emissions inventory source population peaked in 1994 with over 14,000 sources. The 1995 emissions inventory contains approximately 8,200 sources. A considerable effort has been put into improving the quality of the data in the EIS and has resulted in the removal of nearly 6,000 sources and the correction of data for several thousand more sources. Continued maintenance of the current EIS will be resource intensive for both the department and the sources that report the information.

This memorandum is intended to provide guidance to Air Quality Division staff as to what sources should be included in the EIS. The goal is to include: (1) sources that are specifically required to report emissions or compliance status in accordance with an Air Pollution Control Rule or federal Clean Air Act requirement; (2) sources that wish to be included in the EIS so that they can participate in the emissions trading program; and, (3) sources that emit sufficient quantities of air contaminants to warrant their inclusion in county or statewide inventories used to manage the air resource and support the State Implementation Plan (SIP).

**POLICY**

Sources with actual emissions greater than the following emission thresholds will be notified to report emissions annually: CO= 100 TPY, NO<sub>x</sub>= 40 TPY, SO<sub>2</sub>= 40 TPY, PM= 25 TPY, PM<sub>10</sub>= 15 TPY, VOC= 10 TPY, and Pb= 0.6 TPY. These thresholds are based on the significant levels defined in Air Pollution Rule R336.1119(e) with the exception of VOC. The VOC threshold is based on the major source definition for a single hazardous air pollutant in Section 112 of the federal Clean Air Act and the requirement to identify VOC point sources greater than 10 TPY in the SIP. In addition, sources that are specifically required to report emissions or compliance status in accordance with an Air Pollution

Control Rule or federal Clean Air Act requirement will be included in the EIS. Any source that wishes to participate in the emissions trading program will also be included.

## **PROCEDURE**

### **Implementation:**

1. The procedures identified in this memorandum are to begin with the 1996 emissions inventory. Sources that are included in the 1994 and 1995 inventories will be queried with regard to the criteria identified in the policy statement above.
2. The Emissions Reporting and Assessment (ERA) Unit will flag sources in the 1995 inventory that do not meet the criteria. The source will not be flagged if the criteria was met in the 1994 inventory unless emission reductions reported in 1995 are permanent (e.g. due to shutdown or removal of equipment). New sources that were assigned an SRN in 1995 and have not reported emissions to the EIS will not be flagged.
3. Sources that are targeted for Environmental Protection Agency (EPA) compliance reporting, but otherwise do not meet the criteria identified in the policy statement will not be flagged and will remain in the inventory for compliance and inspection reporting only. These sources will not be included in the annual Michigan Air Pollution Reporting (MAPR) mailing or in various inventory summary reports.
4. A list of the flagged sources will be prepared by the ERA Unit. District staff will be given opportunity to review the source list and can request that a source be retained in the EIS. This may occur if source emissions are not accurately identified in the inventory because of an incomplete submittal, a lack of emission factors, or the source has not been operating at normal production levels. The decision to retain the source will be made by the district office.
5. The ERA Unit with the assistance of the Information Processing Unit (IPU) will initialize the 1996 EIS tables by populating them with data from the 1995 inventory sources that have not been flagged. Emissions data from the flagged sources will be archived with the 1995 inventory.

### **Maintenance:**

1. Each year the ERA Unit with the assistance of the IPU will initialize the EIS tables for the next year with data from the current year by following the procedure outlined above. New EIS sources will remain in the system for at least three years to assure that the screening procedure will be applied to their typical operating conditions.
2. In January, all sources included in the EIS, except those identified in item 3 of the implementation procedure, will be notified to report their emissions in accordance with Rule 2. The ERA Unit will provide sources with a MAPR packet that will include a copy of their emissions data from the previous year, along with blank forms and instructions. Sources will report their emissions to the district office responsible for the county in which the source is located.
3. The district staff will review all submittals. All routine data entry and editing will also be performed by district staff.

New EIS Sources:

- 1a. The ERA Unit will continue to assign an SRN to all new sources for permit tracking purposes. The new source will only be entered into the EIS if Permit Section staff feel that it exhibits a potential to meet the criteria identified in the policy statement. The Permit Section must provide the information necessary to initially enter the source in the EIS. The specific information required to initialize a facility in the EIS will be determined by a small workgroup representing the Permit Section, Compliance Section and the ERA Unit.
- 1b. District or Lansing staff can request that an existing source be entered into the EIS if the source exhibits a potential to meet the criteria identified in the policy statement. This may occur, for example, after EPA either revises or issues new emission factors that apply to the source.
- 1c. A source may request to be included in the emissions inventory by submitting completed MAPR forms. A source must be included in the inventory to participate in the emissions trading program.
2. The ERA Unit will assign an SRN once staff (or the source) has provided the necessary information to initially enter the source.
3. District staff should enter as much data as possible for the new source. This includes source identification and mailing information, as well as identification of all points and segments.
4. The source will then be sent an MAPR packet the following January in accordance with Rule 2. For cases 1a and 1b, the source will be retained in the EIS for at least three years. If, after three years, the emissions data submitted on the MAPR forms indicate that the source does not meet the criteria identified in the policy statement, it will be not be included in future inventories.

Reporting:

- A. All EIS source data will be reported to the EPA AIRS Facility System.
- B. All EIS source data will be reported to the Great Lakes National Program Office in RAPIDS format in accordance with the Great Lakes Initiative.
- C. All EIS source data will be included in either the point or area source categories of the SIP inventories.

This memorandum is intended to provide guidance to AQD staff to foster consistent application of Part 55 of Act 451 of Public Acts of 1994, the Natural Resources and Environmental Protection Act and the administrative rules promulgated thereunder. This document is not intended to convey any rights to any parties nor create any duties or responsibilities under law. This document and matters addressed herein are subject to revision.

Questions regarding this memorandum should be directed to John Schroeder at 517-335-1588.

RSJ:JS:amh